

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

DON GIBSON, LAUREN CRISS, and)	
JOHN MEINERS, Individually and on)	
behalf of all others similarly situated,)	Case No. 4:23-cv-00788-SRB
)	
Plaintiffs,)	The Hon. Stephen R. Bough
)	
v.)	
)	
NATIONAL ASSOCIATION OF)	
REALTORS, COMPASS, INC., EXP)	<u>Oral Argument Requested</u>
WORLD HOLDINGS, INC., REDFIN)	
CORPORATION, WEICHERT)	
REALTORS, UNITED REAL ESTATE, and)	
DOUGLAS ELLIMAN, INC.)	
)	
Defendants.)	
)	
)	

CORPORATE DEFENDANTS' MOTION TO DISMISS

Pursuant to Federal Rule of Civil Procedure 12(b)(6), and in accordance with the scheduling Order of this Court, Defendants Compass, Inc., eXp World Holdings, Inc., Weichert Realtors, United Real Estate, and Douglas Elliman, Inc. (collectively, "Corporate Defendants") respectfully move to dismiss Plaintiffs' Class Action Complaint for failure to state a claim. Those Corporate Defendants who have separately moved to dismiss pursuant to Rule 12(b)(2) join this motion to dismiss pursuant to Rule 12(b)(6) in the alternative. In support, Corporate Defendants rely on the Suggestions that are being filed concurrently with this motion, the pleadings and records on file with this Court, and such argument as may be presented at any hearing on this motion.

Dated: February 26, 2024

Respectfully submitted,

/s/ Daniel A. Sasse

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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2024, a copy of the foregoing document was electronically filed through the ECF system and will be sent electronically to all persons identified on the Notice of Electronic Filing.

/s/ Daniel A. Sasse

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Attorney for Defendant Compass, Inc.